



Revision to the Toxic Substances Control Act (TSCA) Risk-Based Approval (RBDA) for the Boeing Plant 2 Facility - First Revision, dated May 25, 2011

Abramowski, Edward T

to:

Dave Bartus

06/21/2011 08:48 AM

Cc:

"Verhaar, Michael L"

Hide Details

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Dave,

Boeing is requesting a revision to the Toxic Substances Control Act (TSCA) Risk-Based Approval (RBDA) for the Boeing Plant 2 Facility - First Revision, dated May 25, 2011 (Reference 1).

Boeing requests approval to place crushed concrete with as-found PCBs concentrations less than 50 mg/kg as backfill in any Plant 2 demolition areas that will remain in industrial usage.

Background

Boeing's plan specifically called out "the Plant 2 tunnels" as the area to placed, as backfill, crushed concrete with as-found polychlorinated biphenyls (PCBs) concentrations less than 50 mg/kg (Reference 2, 3). As detailed in Reference 2, backfill will be placed only in areas that will remain in industrial usage. The use of crushed concrete with as-found PCBs concentrations less than 50 mg/kg as backfill is in accordance with the approved RCRA Interim Measure Work Plan (Reference 4, 5).

There are other areas at the Plant 2 demolition site, in addition to the tunnels, that will remain in industrial usage. Boeing believes that placing crushed concrete in any of the "industrial areas" is consistent current RBDA (Reference 1) and poses no additional risk to health or the environment.

- Reference:
- 1) Letter, May 25, 2011, Edward J. Kowalski to Michael L. Verhaar, Toxic Substances Control Act (TSCA) Risk-Based Disposal Approval for the Management of PCB materials at the Boeing Plant 2 Facility - First Revision
 - 2) Letter, February 7, 2011, Michael L. Verhaar to Edward J. Kowalski, Boeing Plant 2 Demolition Area - 40 CFR 761.61(c) Risk-based disposal approval
 - 3) Work Plan, February 4, 2011, Landau Associates for the Boeing Company, Revised Work Plan - TSCA Material Management Plant 2 Demolition Area Seattle, Washington

- 4) Letter, December 9, 2010, William D. Ernst to Shawn Blocker, 2010/2011 Soil and Stormwater Management Interim Measure Work Plan - Demolition Concrete Addendum Boeing Plant 2, Seattle/Tukwila, Washington, EPA ID No. WAD 00925 6819, RCRA Docket No. 1092-01-22-3008(h)
- 5) Letter, December 13, 2010, Shawn Blocker to William D. Ernst, Approval of the Addendum to the Interim Measure Work Plan, 2010/2011 Soil and Stormwater Management Plan, Demolition of Buildings 2-41, 2-44, and 2-49, Boeing Plant 2, Seattle/Tukwila, Washington, Resource Conservation and Recovery Act (RCRA), RCRA Docket No. 1092-01-22-3008(h), EPA ID No. WAD 00925 6819

Thank You,
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